

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VALLEY CHABAD, INC. and RABBI
DOV DRIZIN,

Plaintiffs,

v.

BOROUGH OF WOODCLIFF LAKE,
N.J., ZONING BOARD OF
ADJUSTMENT OF THE BOROUGH OF
WOODCLIFF LAKE, N.J., et al.

Defendants.

Civil No. 2:16-cv-08087-KSH-JAD

**PROPOSED ORDER ON PLAINTIFFS' MOTION TO COMPEL AND
FOR SANCTIONS PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 37**

AND NOW this _____ day of _____, 2019, IT IS HEREBY ORDERED that Plaintiff's motion is GRANTED, and within _____ days from the date of this Order, Defendants shall:

- (1) Provide full and complete answers to Plaintiff's Interrogatories served on the Board: Interrogatory Nos. 3-5, 12-14, 16, 18-23, 28, 31-37; Plaintiffs' Interrogatories served on the Borough: Interrogatory Nos. 3-12, 14, 19-31, 35-37; and Plaintiffs' Interrogatories served on Rendo: Interrogatory Nos. 2, 7-9, 12, 15-19, 21-23.
- (2) Produce all outstanding Responses and Objections to Plaintiffs' Requests for Production of Documents served on Defendants.
- (3) Produce emails from the agreed upon custodians' personal email accounts responsive to Plaintiffs' Requests for Production of Documents.

- (4) Produce emails from January 1, 2000 through December 31, 2009 that are responsive to Plaintiffs' Requests for Production of Documents.
- (5) Pay attorney's fees and costs to Plaintiffs for the filing of this motion.
- (6) Comply with any other sanctions the Court deems appropriate.

BY THE COURT:

HON. JOSEPH A. DICKSON
U.S. Magistrate Judge